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Attorney for Debtor, Tammy Hill

In Re:

TAMMY HILL,

Debtor.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Case No. 09-18639/RG

Chapter 7

**NOTICE OF MOTION TO REOPEN CASE
PURSUANT TO 11 U.S.C. SECTION
350(b); TO PERMIT DEBTOR TO AMEND
SCHEDULES PURSUANT TO FED. BANKR.
P. 1009(a); REQUEST THAT NICHOLAS
J. DELZOTTI, CHAPTER 7 TRUSTEE, BE
REAPPOINTED AS TRUSTEE; AND IMPOSE
A STAY AS TO THE SHERIFF'S SALE DATE
OF MAY 9, 2019 AS TO DEBTOR'S REAL
PROPERTY LOCATED AT 7411 JFK
BOULEVARD EAST, UNIT 303, NORTH
BERGEN, NEW JERSEY 07047 PENDING
REVIEW AND DETERMINATION BY THE
TRUSTEE AS TO VALUE OF DEBTOR'S
PERSONAL INJURY CLAIMS**

**Hearing Date: May 6, 2019
at 10:00 a.m.**

The debtor has filed papers with the Court for an Order to permit the debtor to amend schedules pursuant to Section 350(b); to Permit the Debtor to Amend Schedules Pursuant to Fed. R. Bankr. P. 1009(a); Request that Nicholas J. Delzotti, Chapter 7 Trustee, be Reappointed as Trustee; and Impose a Stay as to the Sheriff's Sale Date of May 9, 2019 as to Debtor's Real Property Located at 7411 JFK Boulevard East, Unit 303, North Bergen, New Jersey 07047 Pending Review and Determination by the Trustee as to Value of Debtor's Personal Injury Claims; and for other such relief as the Court may deem appropriate.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have any attorney, you may wish to consult one.)

If you do not want the Court to permit the debtor to amend schedules pursuant to Fed. Bankr. P. 1009(a) 11 U.S.C. Section 350(b), etc. or if you want the Court to consider your view on the motion, then within seven (7) days prior to the scheduled hearing you or your attorney must:

File with the Court a written request for a hearing (or, if the Court requires a written response, an answer, explaining your positions) at:

United States Bankruptcy Court
P.O. Box 1352
Newark, New Jersey 07101-1352

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive in, on, or before the date stated above.

You must also mail a copy to:

Virginia E. Fortunato, L.L.C. Nicholas J. Delzotti, Trustee
One Kinderkamack Road P.O. Box 20117
Hackensack, N.J. 07601 Newark, N.J. 07101

Office of the United States Trustee
One Newark Center
1085 Raymond Boulevard - Suite 2100
Newark, N.J. 07102

ATTEND THE HEARING SCHEDULED TO BE HELD BEFORE

Honorable: Rosemary Gambardella
Date: May 6, 2019
Time: 10:00 a.m.
Place: United States Bankruptcy Court
Martin Luther King Federal Building
50 Walnut Street - Third Floor
Courtroom 3E
Newark, New Jersey

Pursuant to D.N.J. LBR 9013-2 et seq., if you wish to contest the within motion, you must file with the Office of the Clerk of the United States Bankruptcy Court, responding papers stating with particularity the basis of your opposition to the within motion. A copy of the proposed Order which is sought is enclosed with this Motion.

If you or your attorney do not take steps, the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an Order granting that relief.

Statement of Non-Necessity of Brief: The movant certifies pursuant to D.N.J. LBR 9013(1)(3) that the within motion involves commonly questions of law and fact and does not involve complex or novel issues such as to require the submission of a legal brief.

DATED: April 15, 2019

/s/Virginia E. Fortunato
VIRGINIA E. FORTUNATO, ESQ.
Attorney for Debtor